

# **EXHIBIT 3**

**Business Proposal sent by David Shara  
To Susan Sarandon in 2018, in which  
she accepts the form of compensation  
For her participation**

### **Exhibit 3**

Set of emails from April 2018 in which the defendant explicitly accepts in writing upfront compensation for participating in the film in the form of an artwork print, and receives a business proposal sent by his partner, executive producer David Shara, also on behalf of the plaintiff, producer of the film, in which David Shara states he wants to ‘make money for Susan Sarandon’ and also that he is intent to ‘maximize profits and exposure’, to which she answers suggesting to start distributing the film into film festivals as a first step into commercial distribution, clearly and unambiguously exposed by David Shara.



DVF Films &lt;davincifilms.productionoffice@gmail.com&gt;

**Fwd: 15th GAIFF Parajanov's Thaler, a Lifetime Achievement Award**

Bryan Gibbs &lt;sillygooseemail@gmail.com&gt;

Mon, Apr 16, 2018 at 4:26 PM

To: David Shara &lt;davidshara@me.com&gt;

Cc: DVF Films &lt;davincifilms.productionoffice@gmail.com&gt;, David Shara &lt;davidshara@mac.com&gt;

From Susan:

David,

Thank you for your kind dinner invitation but I'm working on *Ray Donovan* now through October so I don't think it's possible. It's a very special film, but I really have no idea how to market it. I think you need an agent or maybe just look into submissions to festivals. The season is upon us so I think it's too late for this cycle.

Susan

**BRYAN GIBBS** | Office of Susan Sarandon

On Wed, Apr 4, 2018 at 3:07 PM, David Shara &lt;davidshara@me.com&gt; wrote:

Hello Brian,

I think it is long overdue that I introduce myself. My name is David Shara and I have represented Tigran For the last six years as his partner and manager. I am also the producer of the film.

I am not at all in the movie business or the art business other than this project, I am a fancy colored diamond specialist. This is the first movie production for my company, Optimum Diamonds. I am thrilled with all aspects of this project.

Tigran is one of the most respected and sought after artist I have ever met. His art is Extraordinary, he oozes talent. I'm also thrilled with Mr. Arthur Balder and this film. I think his vision is very well conceived and executed in this art film/documentary film. It is both fun to watch and visually stimulating and beautiful. I am proud to be involved.

That being said, I know very little about the movie industry and could use all the help I could get. I am very interested in Susan's involvement in this movie and I am willing to give her a percentage of profits for her involvement and guidance.

I am a huge believer in taking advice from those who are much smarter and more experienced. I am very happy to share profits And accolades.

I would love to hear her commentary, opinion and recommendations on the film after she watches it. It would be my pleasure to treat you, her and her team To a great big bottle of Burgundy and or dinner at the restaurant of her choosing to discuss the movie and a potential partnership. Please let me know your thoughts. I'm available to talk anytime. My phone number is 917-701-3440. My office is in the penthouse of 576 Fifth Avenue. If you are ever in Midtown, let this stand is an open invitation to come and see some of the worlds greatest and rarest natural fancy colored diamonds. Check out our website at [www.optimumdiamonds.com](http://www.optimumdiamonds.com).

I would also like to discuss your thoughts on film festivals. Arthur Balder has done an incredible job on all aspects of this film including submission to film festivals. He deserves an enormous amount of credit. He has put in so much time, effort, expertise and skill. I am beyond proud of him. It is very rare that someone surprises me these days, but he truly impressed me with his patients, expertise, originality and skill level.

I am extremely interested in maximizing both exposure and profits. I am also interested in sharing profits and making money for Ms. Sarandon. I am a huge believer in karma and taking care of your partners. I look forward to meeting you and hope we can do something fabulous here. Have a great dayAnd thank you in advance.

David Shara

Sent from my iPhone

On Apr 4, 2018, at 2:37 PM, DVF Films &lt;davincifilms.productionoffice@gmail.com&gt; wrote:

Dear Bryan,

Let me know the best width (or height) for you and out of that number we get its correspondent width (or height) in proportion to it. Remember that one is a print of her portrait.



Maybe keeping this in mind she can verify what are the best the best sizes for each print.

We can provide a guest for Susan flying same category. Regarding Armenia the festival adds: "she is free to decide the dates of course, but we will be happy to host her for the whole period as well as to provide with personal car, translator, deluxe room in 5 star hotel and a tour through Armenia, if she likes." GAIFF's whole period is / takes place July 8-15, 2018.

I think it would be good if her arrival and departure in Armenia is chosen as soon as possible for flights selection, &c.

Thank you for your quick response,

Bella Jazmin de la Guia,  
Assistant to Producers  
(201) 713-8509

On Wed, Apr 4, 2018 at 2:12 PM, Bryan Gibbs <[sillygooseemail@gmail.com](mailto:sillygooseemail@gmail.com)> wrote:

What is the next size smaller for the prints? And yes, whomever Susan travels with, they would have to travel together.

Thank you,

**BRYAN GIBBS** | Office of Susan Sarandon

On Mon, Apr 2, 2018 at 11:12 AM, DVF Films <[davincifilms.productionoffice@gmail.com](mailto:davincifilms.productionoffice@gmail.com)> wrote:

Dear Bryan,

thank you so much for this information and quick response.

-Regarding the prints: 65 x 45 inch is the smaller size we have now, is it OK? We can get them in any size, so if this is too big just let me know the best size for her as soon as possible.

-Regarding travelling conditions I have a doubt: the second and third guests travel conditions are the same as Susan's? I mean both have to travel highest class available?

I need to clarify this asap to move forward.

Thanks,

Bella Jazmin de la Guia,  
Assistant to Producers  
(201) 713-8509

On Fri, Mar 30, 2018 at 1:28 PM, Bryan Gibbs <[sillygooseemail@gmail.com](mailto:sillygooseemail@gmail.com)> wrote:

Hi Bella,

Our phone number is (212) 675-4285 but email is the best way for us to communicate so everything is in writing. The address here is 147 W 15th St. Suite 108 NYC 10011. What size are the prints? As for travel to a film festival, Susan would fly the highest class available, which in this case would be first class to Paris and then business to Yerevan. Also, she is always offered at least one guest, but more often two.

Thanks,

**BRYAN GIBBS** | Office of Susan Sarandon

On Thu, Mar 29, 2018 at 1:19 PM, DVF Films <[davincifilms.productionoffice@gmail.com](mailto:davincifilms.productionoffice@gmail.com)> wrote:

Dear Bryan,

from now on I will be helping the producers with any events related to 'American Mirror'.

I have to bring to your consideration the previous email with official offer of the GAIFF's Parajanov's Thaler, a Lifetime Achievement Award for contribution to World Cinema to Ms Sarandon,

because a response is needed to the film festival president on its acceptance independently of Ms Sarandon's agenda

still open due to her TV show. Please find the official invitation attached.

I will need to have a phone number of Ms Sarandon office to get a better communication in the future.

Also regarding the prints I will need an address for the prints to be sent to once framed and ready to ship.

For any inquires my phone number is (201) 713-8509.

Thanks,

Bella Jazmin de la Guia,  
Assistant to Producers  
(201) 713-8509

----- Forwarded message -----

From: **Arthur Balder** <arthurbalderfiles@gmail.com>

Date: Tue, Mar 27, 2018 at 6:36 PM

Subject: 15th GAIFF Parajanov's Thaler, a Lifetime Achievement Award

To: Bryan Gibbs <sillygooseemail@gmail.com>

Cc: David Shara <davidshara@me.com>, David Shara <davidshara@mac.com>

Hello Susan,

this email contains attached the official letter from Golden Apricot Intl Film Festival to "honor you with the highest award of the festival - Parajanov's Thaler, a Lifetime Achievement Award for your contribution to World Cinema."

The letter was sent via email to Tigran a few days ago and he forwarded it to us and I bring it into our conversation now since today you answered regarding Armenia Film fest.

They also would love to have you there as guest of honor, but nonetheless it corresponds to you to answer if you accept the award although your presence is not yet sure.

The complete email is below, please let me know so that we can answer them. They want to cover all the expenses, business ticket, deluxe 5-star hotel room, tour through Armenia, &c.

All the best,  
Arthur

----- Forwarded message -----

From: **TIGRAN TSITOGHDZIAN** <tigrants@icloud.com>

Date: Mon, Mar 19, 2018 at 4:34 PM

Subject: Fwd: Invitation to the 15th Golden Apricot International Film Festival

To: Arthur Balder <arthurbalderfiles@gmail.com>

Begin forwarded message:

**From:** <k.avetisyan@sputniknews.com>

**Subject:** Invitation to the 15th Golden Apricot International Film Festival

**Date:** March 17, 2018 at 8:04:50 AM EDT

**To:** <tigran.tsi@gmail.com>

Dear Ms. Sarandon,

Hope this email finds you well .

On behalf of Golden Apricot International Film Festival and Susanna Harutyunyan, director of the festival,



I have the privilege to invite you as **Guest of Honor** to the 15<sup>th</sup> edition of our festival, which is scheduled for July 8-15, 2018

It would be great to welcome you among our guests to honor you with the highest award of the festival- Parajanov's Thaler-Lifetime Achievement Award for your contribution into the world cinema.

We would also love to organize a retrospective of your films during the festival.

**The festival administration will gladly cover all the expenses related to your trip and stay in Yerevan.**

**We can assure you of the highest level of reception. We will be happy to provide you with a business class ticket, personal car, translator, a deluxe room in a 5-star hotel, and of course, a tour through Armenia if you like.**

We are open to discuss other conditions of your trip too.

We are truly hoping that you will be able to accept our invitation.

Yerevan and Armenians are looking forward to meeting you very soon.

Attached you can find the official invitation.

We very much look forward to your thoughts and hope to welcome you in Armenia.

Sincerely,

Varvara.

**VARVARA HOVHANNISYAN**

**HEAD OF INTERNATIONAL DEPARTMENT**

**GOLDEN APRICOT YEREVAN IFF**

**3 Moskovyan Str., 0001,**

**YEREVAN ARMENIA**

**TEL/FAX +374 10 34 87 87**

**MOB.: + 374 98 200 798**

**[WWW.GAIFF.AM](http://WWW.GAIFF.AM)**

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Bella Jazmin de la Guia  
Assistant to Producers  
(201) 713-8509  
MP News

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Bella Jazmin de la Guia  
Assistant to Producers  
(201) 713-8509  
MP News



DVF Films <davincifilms.productionoffice@gmail.com>

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## Fwd: 15th GAIFF Parajanov's Thaler, a Lifetime Achievement Award

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**Bryan Gibbs** <sillygooseemail@gmail.com>

Mon, Apr 16, 2018 at 4:23 PM

To: DVF Films <davincifilms.productionoffice@gmail.com>

Cc: David Shara <davidshara@me.com>, David Shara <davidshara@mac.com>

Hi There,

Susan was thinking about 3.5 feet tall for the prints. Would that work?

**BRYAN GIBBS** | Office of Susan Sarandon

[Quoted text hidden]